

## REMARKS

Applicants respectfully traverse and request reconsideration.

Claims 12-16, 19-22 have been amended. No new matter has been added.

### Claim Rejections

Claims 12-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,825,848, Fu et al. (“Fu”). Applicants respectfully note that Fu appears to be directed to a synchronized two-level graphics processing cache including only a single level one cache and a single level two cache. (Abstract, emphasis added). Applicants are unable to find any teaching or suggestion in Fu as to a plurality of level one caches where each is associated with a corresponding graphics pipeline.

### Independent Claims

Each of claims 12 and 16 comprise a plurality of level one caches that: comprise texel information, are each associated with a corresponding graphics pipeline, and are each operatively coupled to a common level one cache. Both the Office action and Fu appear to be silent to any teaching or suggestion as to this claimed limitation. In fact, Fu appears to teach the opposite: a single level one cache coupled to a single level two cache without any reference to a plurality of graphics pipelines. In other words, Fu’s system is not compatible with a graphics system employing more than one pipeline and consequently suffers from a lack of scalability. In contrast, Applicants’ claimed invention advantageously makes use of a corresponding plurality of pipelines and therefore allows for the transfer of more information per clock cycle. (*See e.g.*, Applicants’ originally-filed application, p. 7, ll. 8-17). For these reasons alone, Applicants respectfully submit that claims 12 and 16 are in proper condition for allowance.

Applicants further note that Fu does not contemplate, teach or suggest a common level two cache operatively coupled to each of the plurality of level one caches. Even if one were to assume, solely for purposes of argument, that Fu could be scaled to operate in a graphics system

employing multiple pipelines, Fu appears to teach an equal number of level two caches as level one caches. This is in contrast to Applicants claimed subject matter where a plurality of level one caches is operatively coupled to a common level two cache. For this reason, in addition to those articulated above, claims 12 and 16 are also believed to be allowable.

Dependent Claims

Dependent claims 13-15 and 17-22 each add additional novel, non-obvious and patentable subject matter. For at least this reason, each of these claims are allowed to be in proper condition for allowance.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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